

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,  
*et al.*,

Defendants.

Civil Action No. 3:14-cv-00852-REP-  
GBL-BMK

**JOINT MOTION TO EXTEND THE DEADLINE TO FILE MOTIONS *IN LIMINE***

Plaintiffs, Defendants, and Intervenor-Defendants (collectively, the “Parties”) jointly request that this Court extend the deadline for filing motions *in limine* to June 9, 2015.

The Parties respectfully submit that there is good cause to grant this motion.

Discovery in this matter was initially scheduled to close on May 22, 2015. *See* Dkt. No. 35.

Discovery was then continued until May 28, 2015 to allow the Parties to take the deposition of Dr. Jonathan Katz, expert for the Intervenor-Defendants. *See* Dkt. No. 56. Subsequently, on May 26, 2015, this Court granted in part and denied in part Plaintiffs’ motion to compel production of certain documents in the possession of Intervenor-Defendants. *See* Dkt. No. 60. Under the terms of that Order, the Intervenor-Defendants must produce certain documents and materials on June 1 and 3, 2015. *See id.* Intervenor-Defendants are currently preparing for that production.

The current deadline for filing motions *in limine* is May 29, 2015. Under the original schedule, May 29 would have fallen one week after the close of discovery. *See* Dkt. No. 35. Under the current schedule, however, that date falls one day after the close of discovery and one day after the deposition of Dr. Katz. *See* Dkt. No. 56. Continuing the deadline for motions *in limine* to June 9, 2015 would give the Parties adequate time to prepare their motions in light of the full record, including Dr. Katz's deposition. Continuing the deadline would also allow the Parties to prepare their motions *in limine* in light of the additional documents due to be produced by Intervenor-Defendants on June 1 and 3.

For the foregoing reasons, the Parties respectfully request that this Court extend the deadline for filing motions *in limine* from May 29, 2015 until June 9, 2015.

Pursuant to this Court's ECF Policies and Procedures, a consent order reflecting this proposed modification will be filed with the clerk's office.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of May, 2015, I caused the foregoing to be electronically filed with the Clerk of this Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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